

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

Plaintiff,

-vs-

Criminal Action No.  
23-00203-01-CR-W-HFS

DALE D. MITCHELL, JR.,  
Defendant.

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**PRETRIAL CONFERENCE MEMORANDUM**

Upon advisement from the parties that a pretrial conference is not necessary and confirmation that the information from the last pretrial conference remains accurate, the following information is provided in advance of the September 16, 2024, bench trial:

**PENDING CHARGE:**      Count One      Felon in Possession of a Firearm, *in violation of*  
18 U.S.C. §§ 922(g)(1) and 924(a)(8)

**TRIAL COUNSEL:**

Government: Ashleigh Ragner and Jessica Jennings  
Case Agent: Kansas City, Missouri Police Department Detective Jeremy Gragg  
Defense: Bob Kuchar; Investigator Mark Wolpink will assist

**OUTSTANDING MOTIONS:** None

**ANTICIPATED MOTIONS:** None

**TRIAL WITNESSES:**

Government: 6 with stipulations; 7 without stipulations  
Defense: No additional witnesses; Defendant will not testify

**TRIAL EXHIBITS:**

Government: 50 exhibits  
Defense: No additional exhibits

**DEFENSES:**

( x ) defense of general denial  
( ) defenses of general denial and \_\_\_\_\_

**POSSIBLE DISPOSITION:**

( ) Definitely for trial                      ( x ) Likely for trial  
( ) Motion to continue to be filed      ( ) Likely a plea will be worked out

**TRIAL TIME:**

Government: 1 day for bench trial

Defense: No additional time beyond that estimated by Government

**STIPULATIONS:**

- ☐ not likely
- ☐ not appropriate
- ☒ likely as to:
  - ☐ chain of custody
  - ☐ chemist's reports
  - ☒ prior felony conviction
  - ☐ interstate nexus of firearm

**UNUSUAL QUESTIONS OF LAW:** None

**FILING DEADLINES:**

**Witness and Exhibit Lists:**

Government: August 30, 2024

Defense: August 30, 2024

**Counsel are requested to list witnesses in alphabetical order on their witness list.**

**TRIAL SETTING:** This case is set for a bench trial, beginning September 16, 2024. (Doc. 81)

**OTHER:**

- ☐ A \_\_\_\_\_-speaking interpreter is required.
- ☐ Other assistive devices: \_\_\_\_\_

**IT IS SO ORDERED.**

/s/ Jill A. Morris  
JILL A. MORRIS  
United States Magistrate Judge